

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**DEFENDANT ROBERT MANUEL’S RESPONSE TO PLAINTIFF’S REQUEST
FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant Robert Manuel responds to Plaintiff’s Request for Admissions as follows:

1. Heating, ventilation, and air condition (HVAC) related processed designed to regulate ambient conditions within buildings for comfort or for industrial purposes.

RESPONSE: Answering Defendant has no knowledge.

2. Heating an area raises temperature in a given space to a more satisfactory level than that of the atmosphere.

RESPONSE: Objection. Defendant does not understand what is meant by the term “satisfactory.” Without waiving this objection, it is denied.

3. Ventilation, either separately or in combination with the heating or air condition system controls both the supply and exhaust of air within given areas in order to provide sufficient oxygen to the occupants and to eliminate odors.

RESPONSE: Answering Defendant has no knowledge.

3. Air conditioning designates control of the indoor environment year round to create and maintain desirable temperature, humidity, [sic] air circulation, and purity for the occupants of that space or for the industrial materials that are handled or stored there.

RESPONSE: Answering Defendant has no knowledge.

4. Plaintiffs' complaint alleges inadequate ventilation and air flow on the "old side" of the SCI main kitchen, especially during summer months.

RESPONSE: Admitted.

5. During the filing of the George A. Jackson's "emergency grievance" on July 19, 2005, the "old-side" SCI main kitchen was operating with eight (8) commercial size convectional ovens, four (4) commercial size conventional ovens, two (2) commercial size cooking braisers, one large flat top grill, and a six (6) burner pilot stove.

RESPONSE: Admitted.

6. All the above commercial size appliances on the "old-side" main kitchen at SCI, have a caution plate stamp on the back of each appliances [sic] to not install unless under a [sic] exhaust hood system.

RESPONSE: Answering Defendant has no knowledge.

7. During cold winter temperatures in the SCI main kitchen, inmate workers are not issued thermal wear, nor are they allowed to wear adequate winter clothes in the food preparation/production area.

RESPONSE: Objection. Defendant does not understand what is meant by the term "adequate." Without waiving this objection, it is denied.

8. Plaintiffs original and amended complaints alleges [sic] that "contaminated food being sent out to the prison population."

RESPONSE: Admitted.

9. On July 20, 2005, contaminated food was reported to the Food Service staff at the SCI main kitchen pertaining to beef cube steak.

RESPONSE: Admitted.

10. Sample of beef cube steak that was prepare [sic] from the July 20th, 2005 meal was forward to Michael Knight, Food Services Administrator.

RESPONSE: Denied.

11. Sample beef cube steak were [sic] discovered to be contaminated with larva.

RESPONSE: Denied.

12. The SCI main kitchen have east and west alcove doors.

RESPONSE: Admitted.

13. Prior to July 2005, the SCI main kitchen east and west alcove doors were not self closing doors.

RESPONSE: Denied.

14. Fomer [sic] inmate kitchen worker Joshua Hudson suffered a serious injury to his fingers when one of the SCI main kitchen alcove doors slammed against his fingers.

RESPONSE: Objection. This Request has no relevance to Plaintiff's claims, requests information beyond the scope of rule 26, and is not designed to lead to the discovery of admissible evidence.

15. After the injury to inmate Joshua Hudson, maintenance repair [sic] both east and west alcove doors to be self closing.

RESPONSE: Objection. See response to No. 14. Without waiving this objection it is denied.

16. SCI Food Service staff does not maintain certification records of frequent and regular inspection of the main kitchen, food and equipment to be made.

RESPONSE: Denied.

17. When inmate workers make verbal complaints about excessive heat and/or extreme cold, Food Service staff makes no general assessment of the inmate complaint before notifying Food Service Director or DOC maintenance.

RESPONSE: Denied.

18. Inmate kitchen workers are told to drink plenty of water and and [sic] given breaks when temperature at the SCI main kitchen rise and/or exceeds 100 degree [sic].

RESPONSE: Admitted.

19. There is only one (1) toilet seat for the use of 22-25 inmate kitchen workers per shift.

RESPONSE: Admitted.

20. The Food Service staff office and Food Service Director Chris Senato office at the SCI main kitchen are both equip [sic] with air condition units.

RESPONSE: Admitted.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi
Catherine Damavandi, ID#3823
Deputy Attorney General
Department of Justice
Carvel State Bldg., 6th Fl.,
820 N. French Street
Wilmington, DE 19801

Dated: November 26, 2007

CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2007, I electronically filed the attached *Defendant Robert Manuel's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on November 26, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi
Catherine Damavandi, ID#3823
Deputy Attorney General
Department of Justice
Carvel State Bldg., 6th Fl.,
820 N. French Street
Wilmington, DE 19801

Service List of Non-Registered Parties

George A. Jackson
SBI No.: 171250
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Darus Young
SBI No.: 282852
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Charles Blizzard
SBI No.: 166670
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Frank Williams
SBI No.: 261867
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Roy R. Williamson
SBI No.: 291856
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Anthony Morris
SBI No.: 300363
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Carl Walker
SBI No.: 173378
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Samuel Jones
SBI No.: 465297
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Darwin A. Savage
SBI No.: 232561
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Gilbert Williams
SBI No.: 137575
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Charles B. Sanders
SBI No.: 160428
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Joseph White
SBI No.: 082985
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Timothy L. Malloy
SBI No.: 171278
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Howard Parker
SBI No.: 165324
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Kevin Spivey
SBI No.: 258693

Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

James Johnson
SBI No.: 155123
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Roderick Brown
SBI No.: 315954
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Roger Thomas
SBI No.: 292590
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Lawrence B. Dickens
SBI No.: 124570
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Eldon Potts
SBI No.: 211193
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Jerome Green
SBI No.: 147772
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Rique Reynolds
SBI No.: 266486
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

Vernon Truitt
SBI No.: 188191
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

José Serpa
SBI No.: 350322
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947

John F. Davis
SBI No.: 263753
Sussex Correctional Institution
Post Office Box 500
Georgetown, DE 19947